

REMARKS

I. Introduction

In the final Office Action dated January 11, 2006, the Examiner rejected claims 1, 4, 6, 8, 9, 12, 14, 15, 17-19, 21 and 22 under 35 U.S.C. § 103(a) as being unpatentable over C. Rigney, RFC 2865 – Remote Authentication Dial In User Service (RADIUS), (2000), <http://www.faqs.org/rfcs/rfc2865.html> (“Rigney”) in view of U.S. Pat. No. 6,233,608 (“Laursen”) and U.S. Pat. No. 6,430,619 (“Sitaraman”). Further, claims 2, 3, 5, 7, 10, 11, 13, 16, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rigney in view of Laursen, Sitaraman, and U.S. Pat. No. 5,113,499 (“Ankney”). Applicants respectfully request reconsideration of the claims and withdrawal of the rejections to the claims in light of the following remarks.

II. The Proposed Combination of Rigney, Laursen, and Sitaraman Does Not Render the Independent Claims Unpatentable

The currently-claimed invention is directed to a method and system for providing a digital subscriber line (“DSL”) internet system that offers improved access authentication and security. Generally, each of the independent claims recites a subscriber sending a service request for DSL internet services to a DSL internet service provider. In response to receiving the request for DSL internet service, a line identifier associated with a port assigned to the subscriber is retrieved from a data base and transferred to the DSL internet service provider. The DSL internet service provider then authenticates the service request for DSL internet service based on the line identifier, wherein the DSL internet service provider only authenticates the service request if the subscriber sends the service request through the port associated with the line identifier. Rigney, Laursen, and Sitaraman all fail to disclose at least a method or system that associates a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL internet service based on the line identifier.

There appears to be no dispute that Rigney and Sitarman fail to disclose associating a line identifier with a port assigned to a subscriber of DSL internet service

for the purpose of authenticating a service request for DSL internet service based on the line identifier. The Examiner has admitted that Rigney fails to disclose associating a line identifier with a port assigned to a subscriber wherein the line identifier is usable to authenticate a service. Further, the portion of Sitaraman cited by the Examiner only discloses authenticating a user for DSL service based on a username and a password. The only reference cited by the Examiner that authenticates a user based on a port and identifier associated with a user is Laursen. However, Laursen also fails to disclose associating a line identifier with a port assigned to a **subscriber of DSL service** for the purpose of **authenticating a service request for DSL service** based on the line identifier.

Laursen discloses a system that authenticates users of devices having limited computer power such as cellular phones. In particular, Laursen discloses a service provider authenticating a cell phone based on a device id and a service port where the cell phone is requesting service. Laursen does not disclose, or suggest, authenticating a device **requesting DSL service** based on a line identifier as in the independent claims. In the Office Action dated January 11, 2006, the Examiner stated that Laursen illustrates it was obvious to one of ordinary skill in the art at the time the invention was made for a service request to be to be authenticated based on a line identifier. Applicants respectfully disagree that Laursen illustrates such a broad principle. For example, Laursen makes no reference to authenticating other types of service requests based on a line identifier.

To establish a prima facie case of obviousness, the combined references must teach or suggest each claim limitation. (See MPEP § 2142). None of the references cited by the Examiner disclose associating a line identifier with a port assigned to a **subscriber of DSL service** for the purpose of **authenticating a service request for DSL service** based on the line identifier as in the independent claims. Thus, any combination of Rigney, Laursen, and Sitaraman necessarily cannot render the independent claims, or any claims that are dependent on the independent claims, unpatentable. Applicants respectfully request the withdrawal of the rejection to claims 1, 4, 6, 8, 9, 12, 14, 15, 17-19, 21 and 22 under 35 U.S.C. § 103(a).


III. The Addition of Ankey to the Proposed Combination Does Not Render the Currently-Claimed Invention Unpatentable

Claims 2, 3, 5, 7, 10, 11, 13, 16, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rigney in view of Laursen, Sitarament, and Ankey. Ankey is directed to a security access management system for a packet switched data communications network. Ankey is not directed to DSL networks and does not disclose associating line identifiers with ports assigned to subscribers of DSL service. Like Rigney, Laursen, and Sitarament, Ankey also does not disclose associating a line identifier with a port assigned to a subscriber of DSL internet service for the purpose of authenticating a service request for DSL service based on the line identifier as recited in the independent claims. Thus, any combination of Rigney, Laursen, Sitarament, and Ankey necessarily cannot render the independent claims, or any claims that is dependent on the independent claims, unpatentable. Applicants respectfully request the withdrawal of the rejection under 35 U.S.C. § 103(a).

IV. CONCLUSION

In view of the foregoing amendment and remarks, Applicants submit that the pending claims are in condition for allowance.¹ Reconsideration is therefore respectfully requested. If there are any questions concerning this Response, the Examiner is asked to phone the undersigned attorney at (312) 321-4200.

Respectfully submitted,



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¹ Please note that further to the conversation between the Examiner and Scott W. Brim on December 8, 2005, it is Applicants' understanding that the objection to the drawings is still being held in abeyance.